



Seyfarth Shaw LLP  
620 Eighth Avenue  
New York, New York 10018  
T (212) 218-5500  
F (212) 218-5526  
cstieber@seyfarth.com  
T (212) 218-3382  
www.seyfarth.com

January 13, 2020

**VIA ECF**

Hon. P. Kevin Castel  
United States District Judge  
United States District Court for the Southern District of New York  
500 Pearl Street, Courtroom 11D  
New York, NY 10007

**Re: *Michael Page International Inc. v. Anthony Giaimo d/b/a Capstone Search Partners LLC*, Case No.: 1:19-cv-10981-PKC (S.D.N.Y.)**

Dear Judge Castel:

This firm represents Plaintiff Michael Page International Inc. ("Plaintiff") in the above-referenced action. We write to respectfully request (1) an adjournment of the Initial Pretrial Conference currently scheduled for January 23, 2020 at 11:15 a.m. ("IPTC"), and (2) a corresponding adjournment of the deadlines to file a joint pre-conference letter and proposed Case Management Plan, as outlined in the Court's December 5, 2019 Order (ECF No. 6.) This is Plaintiff's first request for an adjournment of the IPTC and corresponding joint pre-conference submissions.

By way of background, Plaintiff filed the Complaint on November 27, 2019 (ECF No. 1.) The Court scheduled an IPTC for January 23, 2020 at 11:15 a.m. (ECF No. 6.) Further, as per the Court's Order, the parties must submit a joint pre-conference letter by January 16, 2020, and a proposed Case Management Plan prior to the conference (*Id.*) On January 7, 2020, Defendant was served with a copy of the Complaint and his present deadline to file a responsive pleading is January 28, 2020.

Plaintiff respectfully requests that the Court adjourn the IPTC to a date at least one week after the January 28, 2020 responsive pleading deadline, and reset the deadlines for the joint pre-conference submissions accordingly. The reason for this request is that I will be traveling out of state on January 23, 2020 for business and unable to appear.<sup>1</sup> We have not yet reached Defendant to obtain consent to this request.

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<sup>1</sup> To provide alternate dates, we are currently available February 3-7, February 10-11, February 19-21 and most of March 2020.



Hon. P. Kevin Castel  
January 13, 2020  
Page 2

The granting of this adjournment request will not impact any other scheduled deadlines, and is not intended to cause undue delay. We thank the Court for its time and attention to this matter, and for its consideration of this application.

Respectfully submitted,

SEYFARTH SHAW LLP

*/s/ Courtney Stieber*

Courtney Stieber